UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 3:15-cv-633
	)	
SANTANDER CONSUMER USA Inc.,	)	
	)	
Defendant.	)	
	)	

UNOPPOSED MOTION TO REOPEN CASE AND FOR ENTRY OF ADDENDUM TO CONSENT ORDER

Plaintiff, United States of America, pursuant to Rule 7 of the Federal Rules of Civil Procedure and Local Civil Rule 7, hereby moves the Court to reopen the case and for entry of the proposed Addendum to Consent Order. See attached Exhibit A. Plaintiff asks that the proposed Addendum to Consent Order be entered immediately. Defendant, Santander Consumer USA Inc., has signed the proposed Addendum to Consent Order and consented to its terms. Plaintiff has obtained the agreement of Defendant to this motion.

In support of this motion, Plaintiff states that the Court previously approved a Consent Order resolving disputed claims under the Servicemembers Civil Relief Act ("SCRA"), 50 U.S.C. App. §§ 501-597b, which requires Defendant to pay a minimum of $9.36 million in compensation to alleged victims of illegal repossessions. (Consent Order ¶20.) The amount of compensation differs depending whether Defendant was solely responsible for the repossession, or its role was limited to collecting fees related to an illegal repossession. (*Compare* Consent Order ¶22 *with* Consent Order ¶23.)

Defendant subsequently informed Plaintiff of inadvertent errors in information that Defendant provided to Plaintiff regarding Defendant's acquisition of certain motor vehicle loans.

Plaintiff had relied on the faulty information during the parties' settlement negotiations. Defendant identified thirty-eight (38) loans that it had incorrectly identified as acquired through two (2) specific loan purchase transactions, and thirteen (13) loans it had incorrectly failed to identify as acquired through those transactions. As a result of the errors, which affect Defendant's role in the illegal repossession of these fifty-one (51) loans, Defendant acknowledged it owes a minimum of $9.485 million in compensation to alleged victim, which is $125,000 greater than the amount currently reflected in the Consent Order.

For the foregoing reasons, the Court should reopen the case and enter the Addendum to Consent Order.

Dated: March 26, 2015

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CERTIFICATE OF CONFERENCE

On March 26, 2015, I conferred via email with Robert Neil Driscoll, counsel for Defendant Santander Consumer USA, Inc. Mr. Driscoll agreed to the Motion to Reopen Case and for Entry of Addendum to Consent Order on behalf of Defendant.

/s/ Daniel P. Mosteller
DANIEL P. MOSTELLER

CERTIFICATE OF SERVICE

On March 26, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2). I have served counsel for the Defendant, Robert Neil Driscoll, by email at the address below.

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/s/ Daniel P. Mosteller
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